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'99 JAN 29 A11:29

January 27, 1999

By First-Class Mail

The Honorable Peter B. Bloch
Administrative Judge
U.S. Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852

Re: In the Matter of International Uranium (USA) Corporation,
Docket No. 40-8681-MLA-4 (Ashland 2)

Dear Judge Bloch:

For your reference, we provide the following list of changes which were made to *International Uranium Corporation's ("IUSA's") Reply to the State of Utah's Brief in Opposition to IUSA's Source Material License Amendment 6*, filed on January 19, 1999. These changes now appear in the corrected version of the brief dated January 22, 1999, which was mailed to the parties on that same date.

1. Page 2, footnote 1, line 3. [successes the AEC] has been changed to [successor the AEC,].
2. Page 21, sub-heading A. [the AEA, as Amended by UMTRCA, and the] has been changed to [The AEA, As Amended By UMTRCA, And The].
3. Page 25, line 1. [content, and that] has been changed to [content (and)].
4. Page 25, line 2. [by product material,] has been changed to [byproduct material].
5. Page 25, footnote 12, line 5. [prior to finding that a proposed alternate] has been changed to [at the time a finding is made that a proposed alternate].

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6. Page 26, footnote 14(b), line 2. A space has been deleted between the words [or] and [other].
7. Page 27, paragraph 2, line 11. [alternative] has been changed to [alternate].
8. Page 28, paragraph 2, line 11. [wold] has been changed to [would].
9. Page 29, paragraph 2, line 12. [(iv) clean-up any soils] has been changed to [(iv) that mill operators clean up any soils].
10. Page 31 paragraph 1. The paragraph break after the sentence [It is not necessary to satisfy both tests.] has been deleted.
11. Page 31, footnote 17. A period has been added at the end of the footnote.
12. Page 31, footnote 20, line 3. [provide a] has been changed to [provide].
13. Page 33, line 9. [IN] has been changed to [In].
14. Page 33, line 11. A semicolon has been inserted following [operating efficiencies are increased].
15. Page 33, line 14. [or] has been changed to [ore].
16. Page 33, paragraph 3, line 3. [milling, recycling, or disposal] has been changed to [milling or recycling].
17. Page 34, paragraph 3, line 9. The comma following [toll milling] has been deleted.
18. Page 34, paragraph 3, line 12. [but this does not make it unreasonable that uranium will not be extracted] has been changed to [but this does not make it unreasonable to expect that uranium will not be extracted].
19. Page 35, paragraph 2, line 2. [contact] has been changed to [content].
20. Page 37, paragraph 2, line 2. [concentration] has been changed to [content].
21. Page 37, paragraph 2, line 4. [concentration] has been changed to [content].
22. Page 39, bullet point 1, line 5. [licensee's] has been changed to [licensee].

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23. Page 41, sub-heading A(1), line 4. Quotation marks have been inserted around the phrase [handling and disposal fee].

24. Page 41, sub-heading A(1), line 6. Quotation marks have been inserted around the phrase [handling and disposal fees].

25. Page 42, paragraph 3, line 1. [its] has been changed to [their].

26. Page 42, footnote 23, line 5. [source material that may be recovered, financial considerations are only one of several different grounds for justifying a licensee's certification under the Alternate Feed Policy. The co-disposal test] has been changed to [source material that may be recovered. Thus, financial considerations only one of several different grounds for justifying a licensee's certification under Alternate Feed Policy, and the co-disposal test].

27. Page 45, point heading 3, [of the] has been changed to [Of The].

28. Page 46, paragraph 2, line 2. The word [the] has been inserted after the phrase [what is meant by "high" uranium content, so].

29. Page 46, paragraph 2, line 4. [Materials] has been changed to [material].

30. Page 46, paragraph 2, line 6. [Materials] has been changed to [material].

31. Page 46, paragraph 2, line 7. The phrase [in order to reach that conclusion] has been deleted.

32. Page 46, paragraph 2, line 8. [If the State of Utah means] has been changed to [If the State means].

33. Page 47, paragraph 2, line 5. [may not contain high concentrations] has been changed to [may not contain "high" concentrations].

34. Page 48, paragraph 1, line 2. [Specifically, the Agency declined to adopt] has been changed to [The Agency specifically declined to adopt].

35. Page 49, paragraph 3, line 2. [materials] has been changed to [material].

36. Page 50, sub-heading B, line 2. [Material] has been changed to [material].

37. Page 50, sub-heading B(1), line 2. Quotation marks have been inserted around the phrase [handling and disposal fees].

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38. Page 50, sub-heading B(1), line 4. [IUSA will recover and the alternate] has been changed to [IUSA will recover and because the alternate].
39. Page 50, sub-heading B(1)(a), line 2. Quotation marks have been inserted around the phrase [handling and disposal fees].
40. Page 50, sub-heading B(1)(a), line 7. Quotation marks have been inserted around the phrase [handling and disposal fees].
41. Page 51, paragraph 3, line 11. [provides] has been changed to [provide].
42. Page 54, paragraph 1, line 3. [the 25 mrem clean-up standard. By comparison, to that standard is high.] has been changed to [the 25 mrem clean-up standard, and by comparison, to that standard is "high."].
43. Page 54, paragraph 2, line 8. [ores for the extraction of uranium and uranium that contain] has been changed to [ores for the extraction of uranium that contain].
44. Page 60, footnote 30, line 5. [TER at 4 (*see* Exhibit 1)] has been changed to [See NRC Technical Evaluation Report ("TER") for Amendment 6 at 4 (included in Exhibit 1)].
45. Page 61, footnote 31. The citation [See 10 C.F.R. Part 40, Appendix A, Criterion 2.] has been moved from the end of the second sentence to the end of the first sentence.
46. Page 63, paragraph 1, line 7. [See Exhibit 1 at 4 (Attached as Exhibit 1).] has been changed to [See Exhibit 1.]).
47. Page 63, paragraph 1, line 9. [(Exhibit 1 at 4);] has been changed to [Exhibit 1.);].
48. Page 63, paragraph 1, line 14. [(Exhibit 1 at 8.)] has been changed to [(Exhibit 1.)].
49. Page 64, paragraph 1, line 8. [See discussion at pp. 21-22, *supra*.] has been changed to [See discussion at pp. 21-23, *supra*.].
50. Page 65, paragraph 2, line 3. [material are classified] has been changed to [material is classified].
51. Page 65, paragraph 2, line 3. [this does not preclude them from being] has been changed to [this does not preclude it from being].

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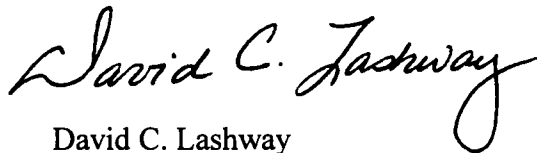
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52. Page 65, paragraph 2, line 4. [*primarily* for their source material] has been changed to [*primarily* for its source material].
53. Page 67, paragraph 1, line 11. [(Exhibit 1)] has been changed to [(included in Exhibit 1)].
54. Page 71, paragraph 2, line 13. [See Affidavit of S. Billin at 9; *see also*, Exhibit 12.] has been changed to [See Affidavit of S. Billin at 9 (Exhibit 12)].
55. Page 75, sub-heading 3, line 11, [(attached as Exhibit 13);] has been changed to [(attached as Exhibit 14);].
56. Page 75, sub-heading 3, line 12. [(Exhibit 9).] has been changed to [(Exhibit 11)].
57. Page 79, paragraph 2, line 7. [material is less than value of certain] has been changed to [material is less than the value of certain].
58. Page 81, paragraph 2, line 9. [the receipt of a toll milling, recycling or recycling fee;] has been changed to [the receipt of a toll milling, or recycling fee;].
59. Page 81, paragraph 2, line 15. [and that to do so] has been changed to [and to do so].
60. Page 81, paragraph 3, line 4. [satisfaction of an ore of these test] has been changed to [satisfaction of one of these tests].
61. Page 82, paragraph 3, line 1. [With respect to Utah's remaining] has been changed to [Utah's remaining].

Sincerely,



David C. Lashway

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